

DONNA J. SMITH, 02094
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Mann Bracken, LLP
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Attorney for Defendants, Mann Bracken LLP
And Arrow Financial Services, LLC

IN THE DISTRICT COURT
DISTRICT OF OREGON

ELEANOR JEAN HARMON,

Plaintiff,

Case No. 09-6296-TC
CIVIL DIVISION

Vs.

MANN BRACKEN, LLP a
Delaware Limited Liability
Partnership, ARROW FINANCIAL
SERVICES LLC, a Delaware Limited
Liability Company,

MOTION TO WITHDRAW AS
COUNSEL FOR DEFENDANTS
AND REQUEST FOR 60 DAY
STAY TO RETAIN NEW
COUNSEL

Defendants

_____/

The undersigned attorney, DONNA J. SMITH, files this motion to withdraw as
counsel for the Defendants, MANN BRACKEN, LLP and ARROW FINANCIAL
SERVICES, LLC, stating as follows:

1. I was asked to represent both Defendants in this matter through my
employment with Mann Bracken, LLP
2. I appeared as attorney for both Defendants.

3. I was advised that the Oregon office of Mann Bracken will close on December 31, 2009, after which I will not have access to any support services including paralegal personnel, phone service, postage meter, client data base, interoffice communication systems, printer or office supplies.
4. I also received notice that my employment with Mann Bracken LLP will cease on December 31, 2009
5. In light of the foregoing, I will not be able to adequately defend MANN BRACKEN, LLP or ARROW FINANCIAL SERVICES, LLC.
6. Defendants will need time to retain new counsel, and the period of 60 days is not unreasonable, and will not prejudice any of the parties.

WHEREFORE, the undersigned requests that she be allowed to withdraw as counsel for the Defendants, MANN BRACKEN LLP and ARROW FINANCIAL SERVICES and that a 60-day stay be granted to allow new counsel to be retained.

Dated: December 26, 2009

/s/ Donna J. Smith
Donna J. Smith OSB #02094
503-262-6815

CERTIFICATE OF SERVICE

I am employed in the County of Multnomah, State of Oregon. I am over the age of 18 and not a party to the within action. My business mailing address is 11124 NE Halsey, PMB 680, Portland, Oregon 97220.

On December 26, 2009 I caused to be served the foregoing document described as:

MOTION TO WITHDRAW AS COUNSEL FOR THE DEFENDANTS AND
REQUEST FOR 60 DAY STAY.

on the following persons:

Samuel E. Sears
Kohl & Beatty, Attorneys at Law, LLC
132 Glynbrook St. N. Suite 350
Keizer, OR 97303

Connell Loftus
Managing Partner – Mann Bracken LLP
702 King Farm Boulevard
Rockville, Maryland 20850
Email cal@mannbracken.com

Paul Ziebert
Vice President and Senior Corporate Counsel
Arrow Financial Services LLC
5996 W. Touhy Avenue
Niles, IL 60714

I declare under penalty of perjury under the laws of the State of Oregon that the above is true and correct.

I declare that I am employed in the office of a member of the bar of this court at whose direction service was made.

Dated: 12/26/2009

/s/ Donna J. Smith
Donna J. Smith